

MUR 6914

COMPLAINT OF LAWSON MULVIHILL MEDIA, INC. REPRESENTED BY MARGARET MULVIHILL,
COMPLAINANT, AGAINST MARISA DEFRANCO, RESPONDENT, CANDIDATE IN 2014 FOR A SEAT IN THE
U.S. HOUSE OF REPRESENTATIVES(6TH DISTRICT, MASSACHUSETTS).

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OFFICE OF GENERAL
COUNSEL

- (1) The full name and address of complainant:

Margaret Ann Mulvihill

Silver Spring, Maryland 20910

- (2) Complainant recites, avers and swears that on March 10, 2014, she and respondent by mutual consent and mutual agreement each voluntarily entered into a written contract (see Exhibit A, attached). Pursuant to the terms of the contract, Respondent hired Complainant to formulate an outreach program to elevate the candidate's profile. Complainant's duties included, but not exclusively,
- (a) Arranging for respondent to receive campaign publicity in the form of appearances on radio and TV shows;
 - (b) Arranging for respondent to receive coverage in print in local and national newspapers;
 - (c) Editing respondent's press releases when originated by respondent;
 - (d) Proposing content for said press releases and for respondent's speeches and responses to interview questions whether given on TV shows or on radio shows or to reporters from above-referenced newspapers.
- (3) Complainant recites, avers and swears that she fully, conscientiously and competently discharged her duties under said contract, which by explicit terms provided a salary of \$500.00 (five hundred dollars) per month plus expenses, such expenses including the cost to complainant of complainant's travels to Massachusetts and of paying for tickets for respondent to attend, and participate in, a journalistic event at the National Press Club in Washington, DC in the Summer of 2014. Complainant states that at that event respondent received political benefit by meeting, and being photographed with, many prominent D.C.-area political journalists who at this event were the recipients of awards for distinguished lifetime service to journalism.
- (4) Complainant states that this complaint is filed because respondent, in her filing of her campaign expense account with the Federal Elections Commission, has omitted to include mention of the debt respondent owes to complainant for political services rendered to and received by respondent. Accordingly, Complainant states, avers and swears, based on information received online and by telephone communication from the Federal Election Commission, that respondent is in violation of the law for failing to comply with the applicable and binding obligation she has that requires that she file with the FEC a full, detailed, and complete account of all expenses she incurred during her campaign and all campaign-related

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debts she owes that remain unpaid.

(5) Complainant states, avers, and swears that she does not in this complaint identify any person, committee or group, other than Respondent, as being the subject of this complaint.

(6) In conclusion, complainant recites that this complaint is submitted under penalty of perjury.

Signed and sworn to me, Kusam Gadh, on this 2nd of Feb, 2015, by Complainant Margaret A. Mulvihill;

Margaret A. Mulvihill

Signature of Margaret A. Mulvihill

Certified Notary Public in the State of Maryland

Kusam Gadh 2/2/15-

KUSAM GADH
Notary Public-Maryland
Montgomery County
My Commission Expires
July 16, 2016

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LAWSON MULVIHILL MEDIA
| SILVER SPRING | MD 20910

Statement of Work
DeFranco for Congress

Lawson Mulvihill will work with DeFranco for Congress ('the candidate') to formulate an outreach program to elevate the candidate's profile among the electorate of the 6th District, Massachusetts ('the electorate'), the local and national media. An aggressive communications campaign will achieve visibility for the candidate among current and future electorate and political media professionals.

Project Scope

- Develop key messaging that will be communicated to the press on a consistent basis
- Increase visibility of the candidate among the electorate and media
- Communicate value positions of the candidate through social media and email marketing
- Build credibility for the candidate's campaign

Strategies

Message Development

Develop messaging which communicates coherent information on the candidate:

- What does the candidate do and plan to do?
- Value of the candidate's offerings to key and potential stakeholders
 - Electorate
 - Political trade and business press, association bodies and industry influencers
- Facts about the candidate's campaign and its positions on specific issues
- Development of campaign messaging, talking points

Communications Outreach

Generate awareness about the candidate, securing media placements and opportunities; position candidate as a political thought leader and spokesperson

- Generate awareness through the dissemination of press releases, and execution of marketing communication strategies

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Tactics

- Press Kit Development
- Dissemination of press releases
 - Target Publications (Sample)
 - Roll Call
 - Politico
 - The Hill
 - The Boston Globe
 - Campaigns and Elections
 - The Washington Post
 - The Huffington Post
 - Regional News Dailies and Business Journals
- Outreach to editors
- Launch and maintain candidate's campaign blog

Budget and Terms

Lawson Mulvihill proposes a monthly agreement at the rate of \$500, to be paid on the 1st business day of each month. This agreement shall continue until the last business day of September 2014. The Lawson Mulvihill Tax EIN is: 46-2239699

In addition, I would bill any pre-approved costs that may be required such as printing, postage, couriers and travel, at cost and without mark-up.

Any pre-approved paid media buys, news wire distribution fees and related expenses would be in addition to my professional fees.

APPROVAL AND ACCEPTANCE OF TERMS

The signature of both parties shall evidence approval and acceptance of these terms.

Margaret Mulvihill

For Lawson Mulvihill

3/10/14

Date

Harriet DeFranco

For DeFranco for Congress

3/10/2014

Date